

Exhibit 4

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

Priorities USA, Rise, Inc., and the
Detroit/Downriver Chapter of the A.
Philip Randolph Institute,

Plaintiffs,

v.

Dana Nessel, in her official capacity as
Attorney General of the State of
Michigan,

Defendant.

NO. 19-13341

JUDGE MARK A GOLDSMITH

MAGISTRATE R. STEVEN
WHALEN

**DECLARATION OF GUY
CECIL IN SUPPORT OF
PLAINTIFFS' MOTION FOR A
PRELIMINARY AND
PERMANENT INJUNCTION**

I, Guy Cecil, declare as follows:

1. I am over the age of 18, have personal knowledge of the facts below,
and can competently testify to their truth.

2. My name is Guy Cecil. I am currently Chairman of Priorities USA.

3. Priorities USA is a 501(c)(4) nonprofit, voter-centric progressive
advocacy and service organization. Its mission is to build a powerful progressive
movement through a permanent campaign to persuade and mobilize Americans
around issues and elections that affect their lives.

4. Priorities USA has made and will continue to make contributions and
expenditures in the millions of dollars to educate, mobilize, and turn out voters in

the upcoming state and federal elections around the country. In particular, Priorities USA has committed to spending \$150 million on voter engagement efforts in Michigan, Florida, Wisconsin, and Pennsylvania in anticipation of the 2020 election.

5. As part of its focus on educating and mobilizing voters in Michigan, Priorities USA launched Priorities Michigan, a project aimed specifically at educating and mobilizing voters and activists in Michigan.

6. A significant focus of Priorities USA's work in Michigan is digital advertising.

7. Priorities USA also employs staff on the ground in Michigan. These staff work with local activists and organizations on projects designed to engage activists and voters in the political process.

8. I am aware of the Voter Transportation Ban and the Absentee Ballot Organizing Ban.

9. I am concerned that the Voter Transportation Ban and the Absentee Ballot Organizing Ban will depress the vote among persons it is targeting for engagement in the political process in Michigan, including low income and student voters and voters who are disabled. Priorities USA is concerned because suppression of this voting population frustrates its mission of and efforts in educating, mobilizing, and turning out voters in Michigan to support progressive candidates and policies.

10. Priorities USA would need to expend additional resources and employee time to educate employees, volunteers, and/or partner organizations in Michigan about what conduct is and is not permitted under the Voter Transportation Ban and the Absentee Balloting Organizing Ban.

11. But for the Voter Transportation Ban, Priorities USA would fund transportation for voters to go to vote in Michigan. Priorities USA has not committed to funding voter transportation because of the Voter Transportation Ban. If Priorities USA is successful in this litigation, Priorities USA intends to fund transportation for voters to the polls in Michigan.

12. But for the Absentee Ballot Organizing Ban, Priorities USA would support partner organizations to organize around absentee voting, including specifically educating voters about their rights to vote absentee and about the absentee voting process, offering assistance to voters in submitting an absentee ballot application, and assisting voters in submitting absentee ballot applications. Because the Absentee Ballot Organizing Ban criminalizes these activities, Priorities USA has abstained from engaging in and supporting absentee voting organizing to avoid exposing its officers, agents, volunteers, and partners to criminal prosecution, conviction, fines, and/or incarceration. Moreover, Priorities has to expend time and resources explaining the current law to its officers, agents, volunteers, and partners so that they are careful if they do discuss absentee voting with Michigan voters. If

Priorities USA is successful in this litigation, Priorities USA will deploy its resources to support partner organizations in organizing Michigan voters around absentee voting.

13. Priorities USA desires to support organizing around absentee voting and rides to the polls for the 2020 election. The available information suggests that several of the federal races including the elections for the U.S. House of Representatives, U.S. Senate, and the U.S. Presidency will be closely contested in Michigan. The outcome of these elections in Michigan will have an outsized influence on our national politics. That is why Priorities USA has focused on Michigan. Priorities USA's ability to mobilize its core constituencies in Michigan for the 2020 election is critical to its mission of building a progressive movement.

I certify under penalty of perjury and pursuant to the laws of the United States that the preceding is true and correct.

Executed on 1/24/20

By: 

Guy Cecil
Chairman
Priorities USA